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December 2, 2008

Ann Steffanic
Board Administrator
Pennsylvania State Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Steffanic:

As a nurse practitioner in practice for 24 years, I support the proposed changes to our rules and regulations for a number of reasons. The current 4:1 NP to physician ratio is unnecessary to insure safe practice by nurse practitioners, and places an undue burden on nurse-managed clinics in the state of Pennsylvania. The Prescription for PA health plan proposed by Governor Rendell calls for an improved access to health care in this state. By allowing this ratio to remain in effect, the number of nurse practitioners practicing in underserved areas where physician supply is low, will be limited. This will adversely affect access to health care in these areas. _

Regarding the proposed changes in prescriptive authority, we need to avoid imposing undue inconvenience and financial hardship on patients in need of schedule II- IV drugs. Limiting quantities of Schedule II drugs to 72 hours, and Schedule III and IV drugs to 30 days puts undue stress on the patient and interrupts continuity of care. Patients are required to make more trips to the pharmacy to fill prescriptions, and more trips to providers, which results in a requirement for more co-payments. They are also unable to utilize less expensive 90-day refill options as recommended by their insurance companies. This may even lead to unnecessary visits to emergency departments for control of pain, when their pain control is interrupted by running out of medication.

The current prescribing regulations, in effect, limit patient choice of provider by making it more inconvenient and more expensive to see a nurse practitioner for their chronic care management. This is counterproductive to the Governor's attempt to improve access to care, through Act 48.

Thank you for your careful consideration of this important practice issue.

Sincerely,

Andrea Wolf, DNP, CRNP

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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